

**EXHIBIT 4 TO  
ANSWER AND COUNTERCLAIM  
TO AMENDED COMPLAINT**



## CEASE AND DESIST

**November 1, 2023**

**Sent via EMAIL only**

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Fisher Broyles  
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Eteros (owner of Triminotor, formerly Mosman Machine Company)  
17665 66A Ave #202  
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CC: Bill Belcourt, CEO Munch Machine, [bill@munchmachine.com](mailto:bill@munchmachine.com)

RE: BUCKMASTER, US patent [11,766,066](#), Canadian patent [3,001,150](#),  
Prior letters 10/16/18, 06/22,22.

Dear Mr. Manning and Eteros:

We represent Frazer Industries LLC DBA [MUNCH MACHINE](#) and its subsidiaries, herein referred to as “MUNCH”. MUNCH is the owner of multiple US and international patents relating to cannabis harvesting, including recently issued US patent [11,766,066](#) (attached) and Canadian patent [3,001,150](#). Claim 1 of both patents is directed at a cannabis harvesting system, including a die member with a plurality of orifices, two rotating members, and **pinch point within six inches of the orifices**.

(12) United States Patent  
Demarais et al.  
(13) Patent No.: US 11,766,066 B2  
(14) Date of Patent: Sep. 26, 2023

(54) SYSTEMS AND METHODS FOR MEDICINAL CANNABIS HARVESTING

(57) Abstract: **Kerry F. Demarais, Sunnyvale, WA (US); Thomas Carpenter, Jr., Grange, WA (US); Craig A. Carpenter, Grange, WA (US); Matthew Ryan Brachman, Richland, ID (US); Thomas Fraser, Richland, ID (US); Bill Belcourt, Lake City, UT (US); Evan Brasher, Issaquah, WA (US)**

(52) U.S. CL. CPC: A61G 2300 (2013.01); A61G 4002 (2013.01)

(51) Int. Cl. A61G 2300 (2013.01)

(58) Field of Classification Search: See application for the complete search history.

(59) References Cited: U.S. PATENT DOCUMENTS

1,138,880 A \* 2/2018 Kudo et al. H01G 1/043

1,138,880 A \* 12/2018 Stone A61G 302 (2013.01)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 1068 days.

(21) Appl. No.: 15/246,494

(22) Filed: Sep. 18, 2016

(65) Prior Publication Data: US 2016/0174060 A1 Dec. 29, 2016

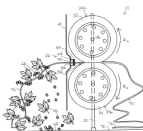
(67) Related U.S. Application Data: Continuation-in-part of application No. 14/012,443, filed on Jan. 24, 2015, now Pat. No. 9,361,334, and a Continuation.

(51) Int. Cl. A61G 4002 (2013.01)

(52) U.S. CL. A61G 4002 (2013.01)

(54) Abstract: One embodiment of the present invention relates to a system for cannabis stem harvesting comprising specifically separate the leaves and buds from the stem. The system includes a frame member, die member, first rotating cylindrical member, second rotating cylindrical member, and a rotation system. The die member is coupled to the frame member and includes a plurality of orifices disposed within a plate. The first and second rotating cylindrical members are coupled to the frame member in a vertical configuration and oriented substantially adjacent to the die member. The vertical configuration of the first and second rotating cylindrical members defines a pinch region therebetween as a region across which a first and second circumferential surface of the first and second rotating cylindrical members are disposed in proximity. The rotation system is coupled to the frame member and at least one of the first and second rotating members.

(57) Claims, 17 Drawing Sheets



1. A system for cannabis stem harvesting configured to specifically separate the leaves and buds from the stem comprising:

a frame member;

a die member coupled to the frame member, wherein the die member includes a plurality of orifices disposed within a plate;

a first rotating cylindrical member coupled to the frame member substantially adjacent to the die member including a first circumferential surface disposed between two ends;

a second rotating member coupled to the frame member substantially adjacent to the die member including a second circumferential surface disposed between two ends;

wherein the two rotating members are oriented and supported by the frame member in a substantially vertical configuration defining a pinch region therebetween as a region across which the first and second circumferential surfaces are in the closest proximity to one another;

a rotation system including a motor and power source coupled to the frame member and at least one of the first and second rotating members; and

wherein the coupling between the die member and the frame member includes disposing the plurality of orifices within six inches of the pinch region.



**BAKER IP PLLC** patent • trademark • conflict • international

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The Trinator BUCKMASTER product, offered for sale on various websites including [www.thetriminator.com](http://www.thetriminator.com) utilizes a dual roller design with a pinch point within six inches of the die orifices. The Trinator BUCKMASTER clearly infringes MUNCH's US patent [11,766,066](#) and Canadian patent [3,001,150](#). MUNCH became aware of the Trinator BUCKMASTER product and sent multiple good faith patent notification letters on October 16, 2018 and June 22, 2022. Eteros responded with a letter on July 21, 2023 arguing that the MUNCH's Canadian patent [3,001,150](#) was fully disclosed by the Trimpro Buckler in July 2016. MUNCH sent a response on August 1, 2022 refuting the assertion that the scope of the patent was disclosed in 2016. Eteros has refused to engage in good faith licensing negotiations. Eteros ongoing sale of the BUCKMASTER product constitute willful infringement.

Munch's US patent [11,766,066](#) issued on September 26, 2023. **MUNCH hereby demands that Eteros immediately cease and desist from all sales of the BUCKMASTER product in both the US and Canada.** If Eteros continues refuse to either enter into licensing negotiations or cease all sales of the BUCKMASTER product, MUNCH will be forced to initiate legal action in the United States.

MUNCH hopes to resolve this matter efficiently and amicably, and therefore invites a representative of Eteros to address its intent regarding this matter within ten days by replying to this email and/or contacting the undersigned at the phone number below.

Sincerely,

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